

CRIMINAL COMPLAINT  
(Electronically Submitted)

<b>United States District Court</b>	DISTRICT of ARIZONA
<b>United States of America</b> v. <b>Jordan LUGO Dorame</b> DOB: 1997; United States Citizen	DOCKET NO.  MAGISTRATE'S CASE NO. <b>24-073027J</b>

Complaint for violation of Title 18, United States Code, § 554(a)

**COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:**

On or about March 18, 2024, in the District of Arizona, **Jordan LUGO Dorame** knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: two (2) Century Arms 7.62X39 rifles, one (1) Palmetto magazine, and one (1) Promag, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

**BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:**

On March 18, 2024, **Jordan LUGO Dorame** attempted to exit the United States and enter the Republic of Mexico through the out-bound vehicle lane at the DeConcini Port of Entry (POE) in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped **Jordan LUGO Dorame**, who was the driver and sole occupant of a 2016 Dodge Ram, bearing Arizona license plate T9A4XF, which was registered to another individual. The primary CBPO asked **LUGO** if he had any weapons, ammunition, or currency more than \$10,000 dollars to declare to which he denied having any of these items. **LUGO** was referred to secondary inspection, wherein CBPOs discovered two (2) Century Arms 7.62X39 rifles, one (1) Palmetto magazine, and one (1) Promag.

In a post-*Miranda* interview, **LUGO** stated he was instructed by an individual earlier in the morning to obtain the vehicle next to a residence in Nogales, AZ. **LUGO** was instructed to then to take the vehicle to a residence in Mexico. He claimed to not know there were firearms hidden within the vehicle; however, **LUGO** believed he was the only one who had access to the vehicle.

**LUGO** at first stated the vehicle belonged to either his father or uncle and that he used the vehicle several times. He later admitted the vehicle was brought to Nogales, AZ from Phoenix, AZ earlier that morning, and that it was "probably" stolen. During the secondary inspection, **LUGO** was found to be in possession of a non-factory key. A subsequent review of **LUGO's** border crossing history revealed he never entered Mexico with the vehicle on any other previous dates.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT <b>CLAY A SCOTT</b> Digitally signed by CLAY A SCOTT Date: 2024.03.19 13:05:50 -07'00'
AUTHORIZED BY AUSA <i>R. Arellano</i> RAQUEL ARELLANO Digitally signed by RAQUEL ARELLANO Date: 2024.03.19 12:19:04 -07'00'	OFFICIAL TITLE HSI Special Agent Clay Scott

Sworn by telephone x

SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> <i>Jaqueline M. Ratican</i>	DATE March 19, 2024
--	------------------------

1) See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54

24-07302MJ

**(BASIS OF COMPLAINTANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)**

**LUGO** admitted he was not licensed to ship/transport firearms across the United States border or sell firearms to any party. **LUGO** stated that he knew taking firearms into Mexico from the United States was illegal.

The firearms and magazines found in the vehicle **LUGO** was driving qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. **LUGO** does not possess a license to export weapons or magazines into Mexico.

